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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION MDL No. 2804  
OPIATE LITIGATION

Case No.  
17-md-2804

Judge Dan Aaron  
Polster

This document relates to:

The County of Cuyahoga, et al. v. Purdue Pharma  
L.P., et al., Case No. 1:17-OP-45004 (N.D.  
Ohio)

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Videotaped Deposition of
DEBORAH FORKAS

January 23, 2019
10:03 a.m.

Taken at:

Napoli Shkolnik PLLC
55 Public Square, Suite 2100
Cleveland, Ohio 44113

Stephen J. DeBacco, RPR

1 Q. Okay. And do you know any of the
2 data about when people end up dying of heroin
3 or fentanyl or some combination of drugs
4 involving heroin or fentanyl or a fentanyl
5 analogue, like, what the actual data shows on
6 how those people are getting started with their
7 addiction?

8 A. Marijuana.

9 MR. ALEXANDER: All right. Thank
10 you very much.

11 THE WITNESS: Thank you.

12 MR. ALEXANDER: I don't have any
13 further questions.

14 Obviously, I'll say this for the
15 record, we think there are a number of
16 documents issues, but we will deal with those
17 through letter writing outside of the record
18 here, as we have done otherwise, and, you know,
19 obviously we make our reservations, on behalf
20 of AmerisourceBergen Drug Corporation, about
21 those.

22 With that I pass the witness to the
23 other Defendants and potentially the
24 Plaintiffs.

25 MS. FARMER: Nothing further from